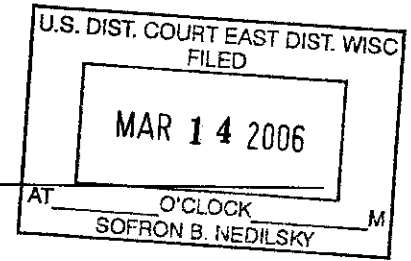


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA,

Plaintiff,

v.

KENYOUNTA HARVESTER,
CHANTEL LOCKETT,
a.k.a. CHANTEL HARVESTER,
LARRY HARVESTER,
ANGELA M. BISSONNETTE,
MARQUIS DAVIS,
JOSEPH JOHNSON,
NINA SIMMONS,
RAFAEL RODRIGUEZ,
RAUL AGUIRRE-ALVARADO,
a.k.a PEDRO AGUIRRE-RAMOS,

06 CR56

Case No.

[18. U.S.C. § 2; 21 U.S.C. §§
841(a)(1), 841(b)(1)(A), 846, and 853]

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

1. Beginning in 2002 and continuing up to and including March 2, 2006, in the State
and Eastern District of Wisconsin,

**KENYOUNTA HARVESTER,
CHANTEL LOCKETT, a.k.a. CHANTEL HARVESTER,
LARRY HARVESTER,
ANGELA M. BISSONNETTE,
MARQUIS DAVIS,
JOSEPH JOHNSON,
NINA SIMMONS,
RAFAEL RODRIGUEZ,**

RAUL AGUIRRE-ALVARADO, a.k.a PEDRO AGUIRRE-RAMOS,

the defendants herein, knowingly and intentionally conspired with each other and with persons known and unknown to the grand jury to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

2. The offense involved 5 kilograms or more of a mixture and substance containing cocaine, a Schedule II controlled substance.

3. The primary purpose of the conspiracy was to accumulate money, wealth and other assets, through the distribution of cocaine.

4. As part of the conspiracy and in furtherance thereof:

- a) Certain conspirators purchased large quantities of cocaine from sources of supply inside and outside of the Eastern District of Wisconsin;
- b) Once obtained from sources, the cocaine was distributed to several "primary distributors" in Milwaukee;
- c) Some of the conspirators used various residences, to store, package, and sell the cocaine;
- d) Some of the conspirators used various vehicles to transport cocaine to customers and to pick up money from customers;
- e) Some of the conspirators used cellular telephones to communicate with each other while conducting their drug trafficking activities; and
- f) Some of the conspirators used and carried firearms during and in relation to their drug trafficking activities.

All in violation of Title 21, United States Code, Sections 846 and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

1. All property of the defendants constituting or derived from any proceeds the defendants obtained as a result of the offense charged in Count One, and all property of the defendants used or intended to be used to commit or facilitate the commission of the offense, is subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853. The properties subject to forfeiture include a personal money judgment against each defendant in the amount of \$1,000,000, an amount representing the unseized proceeds of the offense charged in Count One and funds used to facilitate the offense.

2. This notice applies to, but is not limited to, the following property seized on or about March 2 and March 3, 2006:

- A. Items seized from 16755 W. Dane Ct., Brookfield, WI, to include:
 - i. All jewelry;
 - ii. Glock Model 23 .40 caliber handgun-Serial # HVV044; and
 - iii. \$2224 U.S. Currency.
- B. Items seized from 6580 N. 73rd Street, Milwaukee, WI, to include:
 - i. Glock Model 21 .45 caliber handgun-serial #BZL-829.
- C. Items seized on from 10892 Donna Drive, Milwaukee, WI, to include:
 - i. S&W 9mm handgun-serial #PAM0046; and
 - ii. \$28,900 U.S. Currency.
- D. Items seized from 6018 N. 64th Street , Milwaukee, WI, to include:
 - i. Glock 40 Caliber handgun -Serial #HVVU620.
- E. Items seized from Marquis Davis, to include:
 - i. Gold and diamond dog tag with the letter "K".
- F. Items seized from Larry Harvester, to include:
 - i. Diamond cross and matching earrings.
- G. Items seized from Nina Simmons, to include:
 - i. Jacobs & Co. watch.

- H. Items seized during the arrest of Rafael Rodriguez and Raul Aguirre-Alvarado, a.k.a. Pedro Aguirre-Ramos, to include:
- i. \$204,946 U.S. Currency in a hidden compartment in the front passenger dash board of their vehicle;
 - ii. \$ 2,868 U.S. Currency seized from Aguirre-Alvarado's wallet; and
 - iii. Chevrolet Trail Blazer, Indiana temporary vehicle registration 409104; VIN# 1GNDT13522416917, registered in the name of Ezequiel Solorzano, 110 Walden, Joliet, IL, 60433.

A TRUE BILL:


FOREPERSON

Date: MARCH 14, 2006


STEVEN M. BISKUPIC
United States Attorney